

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE: DEALER MANAGEMENT
SYSTEMS ANTITRUST LITIGATION

MDL No. 2817
Case No. 18 C 864

This Document Relates to:

Motor Vehicle Software Corp. v. CDK Global, LLC, Hon. Amy J. St. Eve
et al., Case No. 1:18-cv-00865 (N.D. Ill.)

**DECLARATION OF DEREK T. HO
IN SUPPORT OF MOTOR VEHICLE SOFTWARE CORPORATION'S SUPPLEMENT
TO ITS OPPOSITION TO DEFENDANTS' SECOND MOTIONS TO DISMISS**

I, Derek T. Ho, declare as follows:

I am a partner with the law firm of Kellogg, Hansen, Todd, Figel & Frederick, P.L.L.C. in Washington, D.C., and counsel to Plaintiff Motor Vehicle Software Corporation ("MVSC") in the above-captioned case. I respectfully submit this Declaration in Support of MVSC's Supplement to Its Opposition to the Motions to Dismiss filed by Defendants CDK Global, LLC ("CDK"), Computerized Vehicle Registration ("CVR"), and The Reynolds and Reynolds Company ("Reynolds").

1. The following facts are based on my personal knowledge or on information provided to me. If called upon as a witness, I could and would testify competently to them.

2. Attached as **Exhibit 1** is a true and correct copy of CDK-1084143, an email from B. Karp to J. Quinlan, dated November 21, 2016.


3. Attached as **Exhibit 2** is a true and correct copy of CDK-1130488 – CDK-1130489, an email chain ending with an email from J. Quinlan to B. Karp, dated July 28, 2017.

4. Attached as **Exhibit 3** is a true and correct copy of CDK-0071912 – CDK-0071913, an email chain ending with an email from J. Quinlan to B. Karp, dated May 19, 2017.

5. Attached as **Exhibit 4** is a true and correct copy of CDK-1086689– CDK-1086691, an email chain ending with an email from B. Karp to J. Quinlan, dated March 16, 2017.
6. Attached as **Exhibit 5** is a true and correct copy of CDK-1044257, an email from J. Navarro to CVR-all-of-sales, et al., dated February 6, 2017.
7. Attached as **Exhibit 6** is a true and correct copy of CDK-0177998 – CDK-0177999, an email chain ending with an email from R. Nichol to H. Gardner, et al., dated March 3, 2014.
8. Attached as **Exhibit 7** is a true and correct copy of CDK-0076911, a PowerPoint presentation titled “CVR FY16 Operating Plan Internal Review.”
9. Attached as **Exhibit 8** is a true and correct copy of CDK-2397246, an email from H. Gardner to S. Herbers and D. McCray, dated February 16, 2016.
10. Attached as **Exhibit 9** is a true and correct copy of CDK-0049413 – CDK-0049415, an email chain ending with an email from S. Herbers to H. Gardner, et al., dated March 10, 2016.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: April 20, 2018



Derek T. Ho